

**CORPORAL BRIAN L. KING  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTY**

October 01, 2020

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<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>3 - - -</p> <p>4 ADA ENGLEMEYER, et al. :</p> <p>5 v. :</p> <p>6 NORTHAMPTON COUNTY : NO. 19-3714</p> <p>7 - - -</p> <p>8 October 1, 2020</p> <p>9 - - -</p> <p>10 Videotape deposition of CORPORAL</p> <p>11 BRIAN L. KING, taken pursuant to notice, was</p> <p>12 held remotely, commencing at 1:15 p.m., on the</p> <p>13 above date, before Torre Lynn Adams, a Court</p> <p>14 Reporter and Notary Public in the Commonwealth</p> <p>15 of Pennsylvania.</p> <p>16 - - -</p> <p>17</p> <p>18</p> <p>19</p> <p>20 ESQUIRE DEPOSITION SOLUTIONS</p> <p>21 Suite 2600</p> <p>22 1835 Market Street</p> <p>23 Philadelphia, Pennsylvania 19103</p> <p>24 (215) 988-9191</p>	<p>1 - - -</p> <p>2 I N D E X</p> <p>3 - - -</p> <p>4 Testimony of: CORPORAL BRIAN L. KING</p> <p>5 By Mr. Zeiger 6, 29</p> <p>6 By Mr. Bradford 27</p> <p>7 - - -</p> <p>8 E X H I B I T S</p> <p>9 - - -</p> <p>10 NO. DESCRIPTION PAGE</p> <p>11 (None)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
Page 2	Page 4
<p>1 APPEARANCES:</p> <p>2</p> <p>3 LEVIN &amp; ZEIGER</p> <p>4 BY: BRIAN ZEIGER, ESQUIRE</p> <p>5 1500 John F. Kennedy Boulevard</p> <p>6 Philadelphia, Pennsylvania 19102</p> <p>7 (267) 225-1776</p> <p>8 zeiger@levinzeiger.com</p> <p>9 Representing the Plaintiffs</p> <p>10</p> <p>11 OFFICE OF ATTORNEY GENERAL</p> <p>12 BY: KEVIN R. BRADFORD, ESQUIRE</p> <p>13 21 South 12th Street</p> <p>14 Philadelphia, Pennsylvania 19107</p> <p>15 (215) 560-2262</p> <p>16 Representing the Defendants</p> <p>17 - - -</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>ALSO PRESENT:</p> <p>SUMMER MENKEE, Videographer</p> <p>- - -</p>	<p>1 - - -</p> <p>2 DEPOSITION SUPPORT INDEX</p> <p>3 - - -</p> <p>4</p> <p>5 Direction to Witness Not to Answer</p> <p>6 Page Line Page Line Page Line</p> <p>7 None</p> <p>8</p> <p>9</p> <p>10 Request for Production of Documents</p> <p>11 Page Line Page Line Page Line</p> <p>12 None</p> <p>13</p> <p>14</p> <p>15 Stipulations</p> <p>16 Page Line Page Line Page Line</p> <p>17 5 1-6</p> <p>18</p> <p>19</p> <p>20 Question Marked</p> <p>21 Page Line Page Line Page Line</p> <p>22 None</p> <p>23</p> <p>24</p>

SUMMARY  
JUDGMENT  
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<p style="text-align: right;">Page 5</p> <p>1 (It is hereby stipulated and 2 agreed by and between counsel that signing, 3 sealing, filing and certification are waived; 4 and that all objections, except as to the form 5 of questions, be reserved until the time of 6 trial.) 7 - - - 8 VIDEO TECHNICIAN: Good afternoon, 9 everyone. We are now on the record. The time 10 is 1:15 eastern standard time, p.m. that is, on 11 October 1, 2020. 12 This begins the video deposition 13 of Trooper or Corporal King taken in the matter 14 of Ada Anglemeyer, et al. versus Northampton 15 County filed in the U.S. District Court for the 16 Eastern District of Pennsylvania, the case 17 number of which is 1937-14. 18 My name is Summer Menkee. I'm 19 your remote videographer today. Our court 20 reporter is Torre Lynn Adams and we represent 21 Esquire Deposition Solutions. 22 If you get knocked off this 23 conference call, Zoom, at any time, there is 24 some Esquire conferencing support in the chat</p>	<p style="text-align: right;">Page 7</p> <p>1 duty as a State Trooper on or about 2 February 23rd of 2018? 3 A. Yes. 4 Q. And did your tour of duty, at some 5 point in time, take to you a location of 340 Old 6 Allentown Road, Bushkill Township, Northampton 7 County, Pennsylvania? 8 A. Yes. 9 Q. Were you there as part of a team 10 called CERT team to execute a warrant? 11 A. Yes. 12 Q. Okay. Now, your deposition today, 13 there's some unusual questions I have to ask you 14 that I normally don't ask most people who I 15 depose, so bear with me. Okay? 16 A. Understood. 17 Q. How tall are you? 18 A. Six-two. 19 Q. And how much do you weigh? 20 A. About 230. 21 Q. Are you in very good shape, 22 athletic shape? 23 A. In my opinion, yes. 24 Q. Okay. Were you of the same</p>
<p style="text-align: right;">Page 6</p> <p>1 for you to help you out. 2 Other than that, just remember to 3 mute your audio, everyone, when you're not 4 speaking, unmute when you're ready to speak. 5 Counsel, go ahead and state your 6 name and whom you represent after which the 7 court reporter will swear in the witness. 8 MR. ZEIGER: Good afternoon. 9 Brian Zeiger for the plaintiffs. 10 MR. BRADFORD: And Kevin Bradford 11 for all the current defendants. 12 - - - 13 CORPORAL BRIAN L. KING, after 14 having been duly sworn, was examined and 15 testified as follows: 16 - - - 17 EXAMINATION 18 - - - 19 BY MR. ZEIGER: 20 Q. Corporal King, good afternoon. 21 How are you? 22 A. I'm doing well, sir. How are you? 23 Q. Good. 24 So, you remember -- were you on</p>	<p style="text-align: right;">Page 8</p> <p>1 height, weight and physical condition at the 2 date and time I indicated earlier, February 23, 3 2018? 4 A. Yes. 5 Q. And I notice today that you're 6 African-American; is that right? 7 A. Yes. 8 Q. Okay. And so, on that day in 9 time, about how many troopers were out there 10 executing the warrant? 11 A. So, there were -- it was both East 12 and West Teams. At full compliment, both teams 13 have 24 apiece. I don't believe everyone was 14 there. So, I could -- I -- I would have to go 15 back and actually look at the base report to 16 count how many guys were there, but it was -- it 17 was both teams of the guys that were available. 18 Q. Okay. And can you estimate, don't 19 guess, but estimate on the team that went inside 20 the residence? Were you on the team that went 21 inside the residence? 22 A. Yes, sir. 23 Q. Can you estimate how many 24 troopers, approximately, went into the</p>

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<p style="text-align: right;">Page 9</p> <p>1 residence?</p> <p>2 A. There were -- it was a double</p> <p>3 entry. So, I believe there was like a main part</p> <p>4 to that house and a rear part, but not to</p> <p>5 belabor, to answer the question, I think it --</p> <p>6 to estimate, between 12 and 16.</p> <p>7 Q. And of those 12 to 16 people, is</p> <p>8 there anyone else that is even remotely close to</p> <p>9 the description of a six-two, 235-pound</p> <p>10 athletically built African-American male that</p> <p>11 was any -- anyone else remotely close to that</p> <p>12 description in the 12 to 16 people that entered</p> <p>13 the house on that day?</p> <p>14 A. No.</p> <p>15 Q. So, you remember the incident,</p> <p>16 right?</p> <p>17 A. Yes.</p> <p>18 Q. And so, if someone described</p> <p>19 someone who was tall, very athletic built,</p> <p>20 African-American, you're the only person that</p> <p>21 was on that job that fits that description on</p> <p>22 that day, right?</p> <p>23 A. I'm the only African --</p> <p>24 African-American on the West Team, so yes.</p>	<p style="text-align: right;">Page 11</p> <p>1 bottom, it says King-2?</p> <p>2 A. Yes.</p> <p>3 Q. I don't know why it says King-2.</p> <p>4 It should say King-1. I think there is no</p> <p>5 King-1. I only have one exhibit for your</p> <p>6 deposition today. Okay?</p> <p>7 I'm going to go --</p> <p>8 A. Oh, okay.</p> <p>9 Q. -- up.</p> <p>10 Do you know what this is, this</p> <p>11 document?</p> <p>12 A. It looks like my callout report.</p> <p>13 Q. What's a callout report?</p> <p>14 A. Callout report is basically the</p> <p>15 report that lists what you did on that</p> <p>16 particular warrant service.</p> <p>17 Q. Okay. And it says Date of</p> <p>18 Activation, 2-23-18. Is that the date that you</p> <p>19 went in to execute the warrant?</p> <p>20 A. Yes.</p> <p>21 Q. It says Date of Report 3-5-18.</p> <p>22 Does that mean that you authored the report</p> <p>23 eight days later?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. So, you're the only</p> <p>2 African-American as well? I didn't --</p> <p>3 A. On the West Team, yes.</p> <p>4 Q. On the West Team.</p> <p>5 So, at the time that the entry</p> <p>6 occurred, you were the only African-American</p> <p>7 person regardless of your height, weight and</p> <p>8 built, correct?</p> <p>9 A. Yes.</p> <p>10 MR. BRADFORD: On the West --</p> <p>11 THE WITNESS: On the West Team.</p> <p>12 BY MR. ZEIGER:</p> <p>13 Q. The West Team's the one who</p> <p>14 entered the house, correct?</p> <p>15 A. There were members West and East</p> <p>16 Team that entered the house.</p> <p>17 Q. Was there anyone else that entered</p> <p>18 the house that was African-American?</p> <p>19 A. No, sir, I don't think so. I</p> <p>20 don't -- I'm pretty -- no. No. That was me.</p> <p>21 Q. Okay. I'm going to mark a</p> <p>22 document now and I am going to try to share my</p> <p>23 screen, bear with me.</p> <p>24 Do you see this document at the</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. And name, it says Trooper Brian L.</p> <p>2 King. That's you?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And the next part says Warrant</p> <p>5 Service. That means you went there to execute a</p> <p>6 warrant?</p> <p>7 A. Correct.</p> <p>8 Q. And the next line says Address.</p> <p>9 And that's the address where the warrant was</p> <p>10 being executed?</p> <p>11 A. Yes.</p> <p>12 Q. And the next line says Date and</p> <p>13 Time of Notification, 2-21-18, 1945 hours. And</p> <p>14 that means that's when you were told there was</p> <p>15 going to be a CERT operation?</p> <p>16 A. Yes.</p> <p>17 Q. And then the next line -- to the</p> <p>18 right of that, says "2-23-18, 18 -- 300 hours."</p> <p>19 That means you got to the barracks</p> <p>20 for the briefing at 3:00 a.m. in the morning?</p> <p>21 A. Correct.</p> <p>22 Q. And then below, it says Straight</p> <p>23 Time Hours, used eight. It means part of your</p> <p>24 regular job, you spent eight hours of regular</p>

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<p style="text-align: right;">Page 13</p> <p>1 time on this?</p> <p>2 A. Yes.</p> <p>3 Q. And to the -- to the right of</p> <p>4 that, it said Overtime Hours Used, eight hours.</p> <p>5 It means you spent eight hours more than your</p> <p>6 normal shift would be in order to work on this</p> <p>7 job, correct?</p> <p>8 A. Correct.</p> <p>9 Q. So, you spent a total of 16 hours,</p> <p>10 approximately, on this case?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Scrolling down, it says "I</p> <p>13 deployed from the East TAC van and was assigned</p> <p>14 as less lethal for the first level."</p> <p>15 What does that mean, deployed from</p> <p>16 the East TAC van?</p> <p>17 A. "Deployed from the East TAC van,"</p> <p>18 so both teams have two vans. One is called TAC.</p> <p>19 One is called Utility. That's just a</p> <p>20 designation for that particular van; TAC,</p> <p>21 meaning it probably had breaching equipment,</p> <p>22 tactical type things. And Utility usually</p> <p>23 carries gas and our explosive breaching.</p> <p>24 So, when it says "Deployed from</p>	<p style="text-align: right;">Page 15</p> <p>1 A. So, there were two levels. And --</p> <p>2 and if -- if I'm talking -- that I'm assuming</p> <p>3 that you know, if not, please back me up.</p> <p>4 So, the main -- there was like a</p> <p>5 main part of the house where it was like a split</p> <p>6 entry; obviously, a split entry, you come in the</p> <p>7 door, you go down into like a basic and then to</p> <p>8 an upper level. The level I went in was around</p> <p>9 the back.</p> <p>10 We considered that to be part of</p> <p>11 the first level. It ran from maybe like a</p> <p>12 garage, a carport, all the way back to the main</p> <p>13 house.</p> <p>14 Does that make sense to you?</p> <p>15 Q. Yes.</p> <p>16 So, the first level was the upper</p> <p>17 level; is that correct?</p> <p>18 MR. BRADFORD: Can we use the term</p> <p>19 upper and lower level and that might -- that</p> <p>20 might --</p> <p>21 MR. ZEIGER: No. I -- I can do</p> <p>22 that, but he wrote first level on this report.</p> <p>23 So, that's why we have to use first level.</p> <p>24 I -- let me ask another question,</p>
<p style="text-align: right;">Page 14</p> <p>1 the East TAC van," that just designates the --</p> <p>2 the exact van that I came out of, and that would</p> <p>3 have been the East TAC van.</p> <p>4 Q. Okay. And "was assigned as less</p> <p>5 lethal."</p> <p>6 What does that mean, "assigned as</p> <p>7 less lethal"?</p> <p>8 A. Assigned as less lethal would be</p> <p>9 with a -- either a beanbag or Taser or both in</p> <p>10 the event that we came across someone who was</p> <p>11 resisting and a level of force did not rise to</p> <p>12 lethal. I was assigned as less lethal.</p> <p>13 Q. Did you use any -- any weapons</p> <p>14 that day?</p> <p>15 A. No.</p> <p>16 Q. Did you use any of the less</p> <p>17 lethal?</p> <p>18 A. No.</p> <p>19 Q. Did you use any force at all?</p> <p>20 A. No.</p> <p>21 Q. And first level, this case,</p> <p>22 there's been some confusion on my part about</p> <p>23 what first level means. So, how many levels of</p> <p>24 the house are there?</p>	<p style="text-align: right;">Page 16</p> <p>1 lay some foundation. Okay?</p> <p>2 MR. BRADFORD: Sure.</p> <p>3 BY MR. ZEIGER:</p> <p>4 Q. So, when you walked in, wherever</p> <p>5 you walked in, were you on the upper level or</p> <p>6 lower level?</p> <p>7 A. I would consider that to be the</p> <p>8 lower level.</p> <p>9 Q. Okay. So, you walked in on the</p> <p>10 lower level and you consider that to be the</p> <p>11 first level; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. And that's why you wrote that in</p> <p>14 your report, right?</p> <p>15 A. Correct, sir. I put it like that</p> <p>16 because I never went up steps.</p> <p>17 Q. I --</p> <p>18 A. I'm sorry. Go ahead.</p> <p>19 Q. No, I want you to finish. It's</p> <p>20 rude of me to interrupt you while you're</p> <p>21 speaking. I'm sorry.</p> <p>22 A. No, no, no. I was just saying</p> <p>23 I -- usually if I don't go up or down --</p> <p>24 (Cell phone ringing.)</p>

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<p style="text-align: right;">Page 17</p> <p>1 Sorry. If I don't go up or down, 2 it's usually I just put it as first level. 3 So, does that help you at all? 4 Q. Yes. And -- 5 A. Okay. 6 Q. "I assisted in clearing and 7 detaining a W/N/M in the leaving area." 8 What does clearing and detaining 9 mean? 10 A. So, I assisted with clearing on 11 that first level up to that living room area and 12 W/N/M, white non-Hispanic male was placed in 13 custody. So, I was right there behind him once 14 we were done clearing. 15 Q. Who placed him in custody? 16 A. If I was that close to him, and I 17 don't remember, but I'm going -- I'm -- I'm 18 pretty sure that was probably me that placed him 19 in custody, because when we were clearing, there 20 were people on the ground. 21 So, once the clearing was done, 22 everyone's placed in the custody. And then 23 we'll do a secondary clear. So, I'm going to 24 say that was me.</p>	<p style="text-align: right;">Page 19</p> <p>1 investigators are the Northampton County police? 2 A. Yes, sir, whoever applied for the 3 search warrant. 4 Q. So, you all went in there, 5 controlled the area there and got everyone 6 detained. And then as soon as the local police 7 arrived, y'all left? 8 A. Yes. Once it was turned over to 9 the investigators, we departed, yes, sir. 10 Q. All right. Next sentence, "I was 11 released from the scene by Command Post/TOPCOM. 12 Postactivation inventory completed. Weapon and 13 equipment maintenance completed." 14 All that's true? 15 A. Yes. 16 Q. And then on 2-21-18, at 17 1945 hours, Corporal Powell activated me for an 18 East warrant service. My scheduled shift was 19 changed from 0700 -- 1500 hours to 0000 to 20 0800 hours to accommodate the warrant." Is that 21 true? 22 A. Yes, sir. 23 Q. So, when did you get the overtime? 24 A. The drive time.</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. Do you know that male's name? 2 A. I don't remember who -- which male 3 it was, no, sir. 4 Q. Was he like a kid, an old man or 5 middle-aged or -- can you give me -- 6 A. I would say not a kid or old man, 7 but I would go with -- with middle-aged. 8 Q. How did you detain him? What did 9 you use to detain them? 10 A. Flex cuffs. 11 Q. Behind his back? 12 A. Yes, sir. 13 Q. Did he complain of any kind of 14 like shoulder pain or anything like that? 15 A. Not that I remember. 16 Q. Did he say I've had a previous 17 injury, anything like that? 18 A. I don't remember him complaining 19 about an injury. 20 Q. Next sentence, Once all primary 21 and secondary clearing was complete and all 22 occupants were secured, residents were held 23 until investigators arrived. 24 And so, does that mean that the</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. I see. You're not from that area? 2 A. No, sir. I'm from the west part 3 -- west side of the State. 4 Q. Oh, I see. Okay. 5 Is there anything missing from 6 this report? 7 MR. BRADFORD: Objection to form. 8 You can answer. 9 THE WITNESS: Is there anything 10 missing? 11 BY MR. ZEIGER: 12 Q. Like do you want to add in more 13 facts, something you didn't type in here? 14 MR. BRADFORD: Objection to form. 15 You can answer. 16 THE WITNESS: Did I just hear 17 objection? 18 MR. BRADFORD: I might 19 periodically object just for the record. 20 THE WITNESS: Okay. 21 MR. BRADFORD: So, yes, I objected 22 to form. You can answer the question to the 23 best of your ability. 24 THE WITNESS: No, there's nothing</p>



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<p style="text-align: right;">Page 21</p> <p>1 I wish to add.</p> <p>2 BY MR. ZEIGER:</p> <p>3 Q. Are there any mistakes?</p> <p>4 A. Not to my knowledge.</p> <p>5 Q. Okay. Very good.</p> <p>6 I'm going to unshare this now.</p> <p>7 A. Okay.</p> <p>8 Q. Okay. So, Trooper --</p> <p>9 MR. BRADFORD: Corporal.</p> <p>10 BY MR. ZEIGER:</p> <p>11 Q. I'm sorry. Corporal, I beg your</p> <p>12 pardon.</p> <p>13 So, Corporal, I'm going to use a</p> <p>14 term called information and belief. It's a</p> <p>15 lawyer term based on -- it means -- it means</p> <p>16 what I think will come up in evidence in the</p> <p>17 case in the future. Okay? Do you follow me on</p> <p>18 that?</p> <p>19 A. Yes.</p> <p>20 Q. That way I can make a statement</p> <p>21 today even though I don't -- I don't -- it's not</p> <p>22 yet on the record, but it will be on the record</p> <p>23 in the future.</p> <p>24 Do you understand what I'm saying?</p>	<p style="text-align: right;">Page 23</p> <p>1 There were other people in the</p> <p>2 room, a lot of jaw jacking going back and forth</p> <p>3 between our guys and theirs. The thing that</p> <p>4 sticks out the most in my mind is the white male</p> <p>5 in front of me making reference to that's why</p> <p>6 your buddy Trooper got shot the other day,</p> <p>7 which, of course, got everybody's attention in</p> <p>8 the room, including my own.</p> <p>9 Everyone got loud again and</p> <p>10 basically I said, hey, this is over, everybody</p> <p>11 relax, everybody relax, and get back to work.</p> <p>12 Q. And you were the one saying that?</p> <p>13 A. Yes.</p> <p>14 Q. And when you say "get back to</p> <p>15 work," that was directed at the other troopers?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. Did you -- did -- was there</p> <p>18 any other thing that you said or something like</p> <p>19 a reprimand that you gave to any other troopers?</p> <p>20 A. No.</p> <p>21 Q. Did you see any other troopers use</p> <p>22 any force?</p> <p>23 A. I did not.</p> <p>24 Q. So, based on information and</p>
<p style="text-align: right;">Page 22</p> <p>1 A. Yes.</p> <p>2 Q. So, based on information and</p> <p>3 belief, my understanding is, is that you</p> <p>4 reprimanded some other troopers in the middle of</p> <p>5 this job, and you were correcting some of the</p> <p>6 behavior of some of the other troopers during</p> <p>7 this -- this job; is that true or false?</p> <p>8 MR. BRADFORD: I'm going to object</p> <p>9 to the question.</p> <p>10 But go ahead.</p> <p>11 THE WITNESS: True.</p> <p>12 BY MR. ZEIGER:</p> <p>13 Q. Okay. And can you say who you</p> <p>14 reprimanded, what for and what was the reprimand</p> <p>15 about? What happened?</p> <p>16 A. So, once everyone was being placed</p> <p>17 in cuffs, being detained, to be honest with you,</p> <p>18 sir, I reprimanded everyone in the room because</p> <p>19 who -- I don't remember who was in front of me,</p> <p>20 the white male, was constantly making things</p> <p>21 worse.</p> <p>22 I remember several times telling</p> <p>23 him just cool out, this is going to be all</p> <p>24 right, just keep your mouth shut, relax.</p>	<p style="text-align: right;">Page 24</p> <p>1 belief, there will be future testimony in this</p> <p>2 case where someone is going to say that you told</p> <p>3 another trooper something like enough's enough,</p> <p>4 like -- like stop doing that.</p> <p>5 Do you -- do you recall having any</p> <p>6 interaction with any trooper regarding any kind</p> <p>7 of statement like that?</p> <p>8 A. I recall having interaction with</p> <p>9 everyone in the room and it was basically for</p> <p>10 everybody going back and forth mouthing off --</p> <p>11 Q. And then --</p> <p>12 A. -- but that was it.</p> <p>13 Q. Okay. Based on information and</p> <p>14 belief, the statement, my understanding was it</p> <p>15 was when one of the officers was using force and</p> <p>16 that you told one of the officers to stop using</p> <p>17 force against an elderly gentleman?</p> <p>18 A. No.</p> <p>19 Q. That's not true?</p> <p>20 A. No.</p> <p>21 Q. Okay. There also was a gentleman</p> <p>22 in his 40s who apparently had some previous</p> <p>23 injury who was zip tied and seated somewhere and</p> <p>24 apparently, you made some comments to someone</p>

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<p style="text-align: right;">Page 25</p> <p>1 about you're using too much force with him; is 2 that true? 3 A. That is not true. 4 Q. Okay. The family is saying if you 5 weren't there, they thought things would be 6 worse, they actually felt like you were the only 7 trooper there that treated them in a fair and 8 honest way on that day. 9 Do you have any comment to make 10 back to that? 11 MR. BRADFORD: Objection to form. 12 You can -- I don't know if that's 13 a question. That's not a question. 14 MR. ZEIGER: I asked if you have 15 any comment on that. 16 THE WITNESS: I can comment? 17 MR. ZEIGER: Yes. 18 THE WITNESS: No, that's -- 19 that's -- that's not the case. No one -- when I 20 said what I said, it was strictly from people 21 talking. There was no one using, you know, 22 force. I didn't come to anyone's rescue. It 23 was just hey, knock it off of the statement hey, 24 that's why your buddy got shot. And then it --</p>	<p style="text-align: right;">Page 27</p> <p>1 MR. BRADFORD: Don't say a 2 statement that your clients told you in 3 confidence and then ask him to comment on it. 4 MR. ZEIGER: No -- no problem. 5 BY MR. ZEIGER: 6 Q. Do you remember there being a 7 trooper there named Painter? 8 A. Yes. 9 Q. Do you -- do you recall seeing 10 Painter take his shield and jamming an old lady 11 up against the wall and lifting her feet off the 12 ground with the shield into the wall? 13 A. No. 14 Q. Do you remember saying anything to 15 Painter about this is too much, calm down? 16 A. No. 17 MR. ZEIGER: I don't have anything 18 further. 19 MR. BRADFORD: I have no question. 20 Oh, wait. I do have a question. 21 - - - 22 EXAMINATION 23 - - - 24 BY MR. BRADFORD:</p>
<p style="text-align: right;">Page 26</p> <p>1 there wasn't nothing -- there wasn't anything 2 like -- it wasn't anything like that at all. 3 BY MR. ZEIGER: 4 Q. Well, the plaintiffs do feel like 5 you came to the rescue. They asked me to call 6 you as my witness in this case. 7 Do you have a comment in regard to 8 that statement? 9 MR. BRADFORD: That's not a 10 question. 11 MR. ZEIGER: Okay. 12 MR. BRADFORD: That's information 13 that's not even part of this case and you're 14 asking him to comment on it. 15 MR. ZEIGER: The Trooper is under 16 oath and I appreciate it's very difficult to 17 testify against fellow -- fellow troopers. So, 18 I want to make sure he gets a full and fair 19 opportunity to say what really happened that 20 day, because my clients have indicated that he 21 stopped someone from hurting them even worse -- 22 MR. BRADFORD: Ask a specific 23 question. 24 MR. ZEIGER: I --</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. The white male who was in front of 2 you who's talking about the other trooper who 3 got shot, that was -- that was one of the people 4 in the house, right, that wasn't obviously a 5 trooper, right? 6 A. I'm sorry, say your -- the male 7 that made the statement that's why your buddy 8 got shot? 9 Q. Yes. The one that was mouthing 10 off -- 11 A. This was no one in the house. 12 This was a trooper had this just been injured 13 days before -- 14 Q. Yeah, actually, that's a bad 15 question. 16 When -- when you started talking 17 about you said there was a white male in front 18 of you who was talking a lot and then he -- then 19 that person said something about that's why your 20 buddy got shot? 21 A. Yes. 22 Q. That person who was making those 23 statements, that was one of the residents, 24 right?</p>

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<p style="text-align: right;">Page 29</p> <p>1 A. Yes, it was the male in front of 2 me. 3 Q. Okay. And was that the male that 4 you that you interacted with, that you secured 5 or do you have -- 6 A. Yes, yes. That was him. 7 MR. BRADFORD: Okay. That's it. 8 - - - 9 EXAMINATION 10 - - - 11 BY MR. ZEIGER: 12 Q. Do you know that guy's name? 13 A. I do not. 14 Q. Is there anything else that 15 happened that day that I didn't ask you about 16 that you want to tell us about? 17 MR. BRADFORD: Objection to form. 18 THE WITNESS: No. 19 MR. ZEIGER: Okay. I have nothing 20 further. 21 MR. BRADFORD: Okay. Thank you, 22 Corporal. 23 VIDEO TECHNICIAN: Are we ready to 24 conclude his deposition?</p>	<p style="text-align: right;">Page 31</p> <p>1 (Deposition concluded at 1:39 2 p.m.) 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 30</p> <p>1 MR. BRADFORD: Oh, yeah, yeah. 2 So, she just has to make a statement to 3 conclude, I -- 4 VIDEO TECHNICIAN: Yeah, she's 5 making a statement. 6 MR. BRADFORD: I should know this 7 by now. 8 VIDEO TECHNICIAN: I know. Third 9 one, right. Wait. Yeah, just stay on until 10 we're done with the cert. 11 This concludes the videoconference 12 deposition of Trooper or Corporal King. And I 13 believe, gentleman, just for the record, if you 14 could say your transcript and video orders for 15 the court reporter and myself. 16 MR. ZEIGER: Yes. I would like 17 the PDF of the minuscrypt e-mailed to me and the 18 video in the cheapest format available. 19 MR. BRADFORD: I'll take the same. 20 VIDEO TECHNICIAN: Same. Great. 21 Then, everyone, we are going off 22 the video record on October 1, 2020 at 1:39 p.m. 23 eastern standard time. 24 (Witness excused.)</p>	<p style="text-align: right;">Page 32</p> <p>1 CERTIFICATE 2 3 I HEREBY CERTIFY that the witness 4 was duly sworn by me and that the deposition is 5 a true record of the testimony given by the 6 witness. 7 8 <i>Torre Lynn Adams</i> 9 10 Torre Lynn Adams, 11 Court Reporter and Notary Public 12 Dated: October 15, 2020 13 14 15 16 (The foregoing certification of 17 this transcript does not apply to any 18 reproduction of the same by any means, unless 19 under the direct control and/or supervision of 20 the certifying reporter.) 21 22 23 24</p>



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